

Comment from Nokian Tyres Plc

Nokian Tyres Plc (www.nokiantires.com) appreciates very much the possibility to share its comment about the proposed rule concerning tires.

Regarding the tire markings and the following tire tests: strength, bead unseating, and endurance and its low inflation pressure mode, Nokian Tyres shares the opinion of the European Tyre and Rim Technical Organisation.

Regarding the tire innovations Nokian Tires share the opinion of the European Tyre and Rim Technical Organisation of technology-neutral legislation, but wishes also to put forward and highlight an example of a good practice to such direction.

Nokian Tyres wishes to share this view point in the hope that at the federal level information could be shared to the state-level regulators, in the form of a good example, towards technology-neutral legislation concerning studded tires.

Recently (in 2019) the state of Ontario in the neighboring country Canada introduced a performance-based regulation on the use of studded tires (www.ontario.ca/laws/regulation/r19004). To the knowledge of Nokian Tyres, all other regulations regarding studded tires in any of the states in the United States are older type and technologically restrictive regulations.

This is important because the technical development of studded tires has been significant over the recent ten years and tire manufacturers have found ways of decreasing the environmental impact of studded tires while at the same time improve the wintry safety performance of those tires.

However, these technical solutions require moving outside the older type of regulations, allowing the manufacturers use the latest innovations on studs and tire-stud-combinations. From regulatory context, this require a performance based (a test-based) regulation with clear limit values to be met. From governance point of view, a performance-based test makes even more sense as it offers an opportunity to measure and know the road wear rate of the studded tires.